

1 DANIEL G. BOGDEN
United States Attorney
2 ANDREW W. DUNCAN
Assistant United States Attorney
3 333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
4 Telephone: (702) 388-6336
Facsimile: (702) 388-5087
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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
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10 UNITED STATES OF AMERICA,) **2:13-cr-00070-GMN-PAL**
11 Plaintiff,)
12 vs.) **STIPULATION FOR PROTECTIVE ORDER**
13 ALLAN DOBKOWSKI, et al)
14 Defendants.)
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16 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
17 United States Attorney for the District of Nevada, and Andrew W. Duncan, Assistant United States
18 Attorney, counsel for the United States, Paola M. Armeni, counsel for defendant FRANK EVANS,
19 that this Court issue an Order protecting from disclosure to the public any discovery documents
20 containing the personal identifying information such as social security numbers, drivers license
21 numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such
22 documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

23 1. Protected Documents which will be used by the government in its case in chief include
24 personal identifiers, including social security numbers, drivers license numbers, dates of birth, and
25 addresses, of participants, witnesses, and victims in this case.
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1 2. Discovery in this case is voluminous. Many of the documents include personal
2 identifiers.

3 3. The United States agrees to provide Protected Documents without redacting the
4 personal identifiers of participants, witnesses, and victims.

5 4. Access to Protected Documents will be restricted to persons authorized by the Court,
6 namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and
7 secretaries employed by the attorney(s) of record and performing on behalf of defendant.

8 5. The following restrictions will be placed on defendant, defendant's attorney(s) and the
9 above-designated individuals unless and until further ordered by the Court. Defendants, defendants'
10 attorneys and the above-designated individuals shall not:

11 a. make copies for, or allow copies of any kind to be made by any other person
12 of Protected Documents;

13 b. allow any other person to read Protected Documents; and

14 c. use Protected Documents for any other purpose other than preparing to defend
15 against the charges in the Superseding Indictment or any further superseding indictment arising out
16 of this case.

17 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made
18 pursuant to this order of the existence and terms of this Court's order.

19 7. The requested restrictions shall not restrict the use or introduction as evidence of
20 discovery documents containing personal identifying information such as social security numbers,
21 drivers license numbers, dates of birth, and addresses during the trial of this matter.

22 8. Upon conclusion of this action, defendant's attorney(s) shall return to government
23 counsel or destroy and certify to government counsel the destruction of all discovery documents

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1 containing personal identifying information such as social security numbers, drivers license numbers,
2 dates of birth, and addresses within a reasonable time, not to exceed thirty days after the
3 last appeal is final.

4 DANIEL G. BOGDEN
5 United States Attorney

6 _____/s/_____
7 ANDREW W. DUNCAN
8 Assistant United States Attorney

7/9/2013
DATE

9 _____/s/_____
10 PAOLA M. ARMENI
11 Counsel for defendant
12 FRANK EVANS

6/5/2013
DATE

13 **ORDER**

14 IT IS SO ORDERED this 37th day of June, 2013.

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17 UNITED STATES OF AMERICA
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